

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No. 20-cr-113 (DSD/BRT)

UNITED STATES OF AMERICA,

SUPERSEDING INDICTMENT

Plaintiff,

18 U.S.C. § 3

18 U.S.C. § 844(c)

v.

18 U.S.C. § 844(i)

18 U.S.C. § 853(p)

1. JOSE A. FELAN, JR.,

18 U.S.C. § 982(a)(2)(B)

2. MENA D. YOUSIF, and

18 U.S.C. § 982(b)(1)

3. MOHAMED HUSSEIN ABDI

28 U.S.C. § 2461(c)

Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Arson)

On or about May 28, 2020, in the State and District of Minnesota, the defendant,

JOSE A. FELAN, JR.,

maliciously damaged and destroyed, and attempted to damage and destroy, by means of fire, a building used in interstate or foreign commerce and in activity affecting interstate or foreign commerce, namely, the Goodwill retail store located at 1239 University Avenue West, in St. Paul, Minnesota, all in violation of Title 18, United States Code, Section 844(i).

COUNT 2

(Accessory After the Fact)

On or about May 28, 2020, through the present, in the State and District of Minnesota and elsewhere, the defendant,



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MENA D. YOUSIF,

knowing that an offense against the United States had been committed, to wit, arson as set forth in Count 1, did receive, relieve, comfort, and assist the offender, Jose A. Felan, Jr., in order to hinder and prevent the offender's apprehension, trial, and punishment, all in violation of Title 18, United States Code, Section 3.

COUNT 3

(Arson)

On or about May 28, 2020, in the State and District of Minnesota, the defendant,

**JOSE A. FELAN, JR., and
MOHAMED HUSSEIN ABDI**

maliciously damaged and destroyed, and attempted to damage and destroy, by means of fire, a building used in interstate or foreign commerce and in activity affecting interstate or foreign commerce, namely, the Gordon Parks High School located at 1212 University Avenue West, in St. Paul, Minnesota, all in violation of Title 18, United States Code, Section 844(i).

COUNT 4

(Arson)

On or about May 28, 2020, in the State and District of Minnesota, the defendant,

JOSE A. FELAN, JR.,

maliciously damaged and destroyed, and attempted to damage and destroy, by means of fire, a building used in interstate or foreign commerce and in activity affecting interstate or foreign commerce, namely, the 7 Mile Sportswear store located at 590

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University Avenue West, in St. Paul, Minnesota, all in violation of Title 18, United States Code, Section 844(i).

FORFEITURE ALLEGATIONS

If convicted of Counts 1, 3, or 4 of this Superseding Indictment, the defendants, **MOHAMED HUSSEIN ABDI**, and/or **JOSE A. FELAN, JR.**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation, and pursuant to Title 18, United States Code, Section 844(c) and Title 28, United States Code, Section 2461(c), any explosive materials involved or used or intended to be used in the violation.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON